



## **Air Quality Permitting Statement of Basis**

**January 28, 2005**

**Tier II Operating Permit No.: T2-040422**

**ConAgra Foods Packaged Foods Company, Inc., dba Lamb-  
Weston, Inc. and ConAgra Foods Specialty Potato Products  
Twin Falls, Idaho**

**Facility ID No. 083-00062**

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AIR QUALITY DIVISION**

**FINAL PERMIT**

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## **Acronyms, Units, and Chemical Nomenclatures**

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFPFCI	ConAgra Foods Packaged Foods Company, Inc.
CO	carbon monoxide
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
NO <sub>x</sub>	nitrogen oxides
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
Rules	Rules for the Control of Air Pollution in Idaho
SO <sub>2</sub>	sulfur dioxide
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400, *Rules for the Control of Air Pollution in Idaho*, for issuing permits to operate.

## **2. FACILITY DESCRIPTION**

ConAgra Foods Packaged Foods Company, Inc. (CFPFCI) processes raw potatoes into frozen, fried, hash brown, mashed, and special potato products for consumer sales.

## **3. FACILITY / AREA CLASSIFICATION**

ConAgra Foods Packaged Foods Company, Inc. is classified as a synthetic minor facility because enforceable operational limits limit the facility's potential to emit to less than Tier I operating permit major source thresholds. The Aerometric Information Retrieval System (AIRS) facility classification is "SM80" because the facility's potential to emit is greater than or equal to 80% of the major source threshold level(s). The SIC defining this facility is 2099. The facility is located within AQCR 63 and UTM zone 11. The facility is located in Twin Falls County which is designated as unclassifiable for all criteria pollutants (PM<sub>10</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, lead, and ozone).

The AIRS information that was contained in the April 1, 2003 Tier II operating permit remains unchanged for this Tier II permit.

## **4. APPLICATION SCOPE**

The application requests a name change for the permittee due to corporate reorganization. The same corporate entity retains ownership and control so this project is a true name change request. This facility was previously permitted under the name of Lamb-Weston, Inc., a subsidiary of ConAgra Foods, Inc. The official name for the facility is now "ConAgra Foods Packaged Foods Company, Inc., dba Lamb-Weston, Inc. and ConAgra Foods Specialty Potato Products". The change is for an existing Tier II operating permit issued on April 1, 2003.

### **4.1 Application Chronology**

December 13, 2004	PTC application received.
January 4, 2005	Application certification received.
January 5, 2005	Corporate and facility representatives contacted by telephone and review of facility draft offered. Facility draft review was declined.
January 7, 2005	Additional information received.
January 10, 2005	Application declared complete.
January 28, 2005	Received Comment on the permit cover page from Steve VanZandt, Twin Falls Regional Office.

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the regulatory requirements for this Tier II permitting action:

### **5.1 Equipment Listing**

No equipment is being modified or constructed for this project.

### **5.2 Emissions Inventory**

An emissions inventory is not applicable for this project.

### **5.3 Modeling**

Modeling is not required for this project.

### **5.4 Regulatory Review**

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier II operating permit.

IDAPA 58.01.01.404.04 ..... Procedure For Issuing Permits—Permit Revision or Renewal

This project only involves changing the name that the facility does business as; it does not involve a change in ownership of the facility. It is being processed as a permit revision. None of the permit conditions change, nor do the regulations which are applicable to the facility change.

### **5.5 Fee Review**

Tier II permit processing fees are not required for name changes in accordance with IDAPA 58.01.01.407.02.c.

## **6. PERMIT CONDITIONS**

No permit conditions are changed from the original Tier II operating permit No. T2-020425, issued April 1, 2003.

## **7. PUBLIC COMMENT**

A public comment period is not required for revised Tier II operating permits in accordance with IDAPA 58.01.01.404.04 because there are no increase in emissions.

## **8. RECOMMENDATION**

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that CFPFCI be issued a Tier II operating permit for the name change from Lamb Weston, Inc., to "ConAgra Foods Packaged Foods Company, Inc. doing business as Lamb-Weston Foods and ConAgra Foods" as requested by the permittee. No public comment period is required and the project does not involve PSD requirements.

HE/sd

Permit No. T2-0400422